

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ILLINOIS DISTRICT COUNCIL NO. 1 )  
OF THE INTERNATIONAL UNION )  
OF BRICKLAYERS AND ALLIED )  
CRAFTWORKERS, AFL-CIO, )  
Plaintiff, ) Case No. 06 C 6337  
v. ) Judge Grady  
RAMIREZ CONSTRUCTION COMPANY, ) Magistrate Judge Ashman  
Defendant. )

## **AGREED MOTION FOR ENTRY OF JUDGMENT**

Plaintiff Illinois District Council No. 1 of the International Union of Bricklayers and Allied Craftworkers, AFL-CIO (“Union”), respectfully moves this Court for entry of judgment, in the form attached or otherwise, and states as follows in support of its motion:

1. This matter is a suit to enforce a labor arbitration award, with jurisdiction based on 29 U.S.C. § 185.
2. The parties have agreed to entry of judgment and to the proposed form of judgment, a copy of which is attached.
3. The Union seeks judgment enforcing the arbitration award and ordering the relief provided in that award, specifically that Defendant Ramirez Construction Company (“Company”) must provide a bond, letter of credit, or cash bond for \$30,000.00 in the approved form, may not perform any work within the geographic or craft jurisdiction of

the Union until it does so, and must pay the Union \$2,471.25 to reimburse its fees and costs.

4. The Company's attorney, William M. McErlean, Esq., has authorized the Union's lawyer to state that in accord with arrangements previously reached between the parties, the Company agrees to this motion and to the proposed form of judgment.

WHEREFORE, the Union respectfully asks that its motion be granted and that judgment be entered in its favor, in the form attached or otherwise.

Respectfully submitted,

/s/ Barry M. Bennett  
Attorney for

Illinois District Council No. 1  
of the International Union of Bricklayers  
and Allied Craftworkers, AFL-CIO

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